

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

<b>JAMES S. PAVLICHKO, SR.</b>	:	
<b>Plaintiff,</b>	:	
	:	
<b>and</b>	:	
	:	
<b>JAMES S. PAVLICHKO, JR.,</b>	:	
<b>A Minor Child</b>	:	<b>CIVIL ACTION #: 02-cv-02889</b>
<b>Plaintiff,</b>	:	
	:	
<b>vs.</b>	:	
	:	
<b>GLEN MILLS SCHOOL, <i>et al.</i></b>	:	
<b>Defendants.</b>	:	
	:	

**DECLARATION OF MATTHEW A. HAMERMESH  
IN OPPOSITION TO DEFENDANTS'  
MOTION FOR SUMMARY JUDGMENT**

I, Matthew A. Hamermesh, hereby declare as follows:

1. I am an attorney with the law firm of Hangley Aronchick Segal & Pudlin, and I represent Plaintiffs James Pavlichko, Sr. and James Pavlichko, Jr. in the above-captioned action.

2. Attached hereto are true and correct copies of the following documents:

<b>Exhibit No.</b>	<b>Description</b>
<b>A.</b>	Excerpts from Deposition of James Pavlichko, Jr., June 16, 2003
<b>B.</b>	Excerpts from Deposition of James Pavlichko, Sr., June 16, 2003
<b>C.</b>	Excerpts from Deposition of Thomas Green, July 23, 2003
<b>D.</b>	Excerpts from Deposition of Nelson Yanez, July 25, 2003
<b>E.</b>	Letter, James Pavlichko, Sr. to Superintendent/Director, April 16, 2002
<b>F.</b>	Third Comprehensive Report re: James Pavlichko, The Glen Mills School, June 12, 2002

- G.** Transcript of Placement Review Hearing, In re James Stephen Pavlichko, Jr., Court of Common Pleas, Luzerne County, June 17, 2002
- H.** Excerpt from Tyler Hall Unit Log, May 14, 2002
- I.** Excerpt from Tyler Hall Unit Log, June 16, 2002
- J.** Report, Department of Public Welfare, June 7, 2002
- K.** Excerpts from Student Handbook, Glen Mills Schools

I declare under the penalty of perjury and under the laws of the United States that the foregoing statements are true and correct to the best of my knowledge.

Dated: September 9, 2003

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Matthew A. Hamermesh

**CERTIFICATE OF SERVICE**

I, Matthew A. Hamermesh, hereby certify that on September 9, 2003, I caused a true and correct copy of the foregoing Declaration of Matthew A. Hamermesh in Opposition to Defendants' Motion for Summary Judgment to be served on the following by overnight mail:

Edward M. Galang, Esquire  
Marshall, Dennehey, Warner, Coleman & Goggin  
One Montgomery Plaza, Suite 1002  
Norristown, PA 19401-4814

Guy Vilim, Esquire  
Gold & Vilim  
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Matthew A. Hamermesh